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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GUCCI AMERICA, INC. and CHLOÉ SAS,

Plaintiffs,

-against-

LAURETTE COMPANY, INC. and JENNIFER MARIE MATTCHEN a/k/a JENNIFER MARIE KIRK a/k/a JENNIFER BESSON d/b/a THEBAGADDICTION.COM; PATRICK B. KIRK d/b/a THEBAGADDICTION.COM; ABC COMPANIES; and JOHN DOES,

08 Civ. 5065 (LAK)

STIPULATION REGARDING
MERCHANT RESERVE
ACCOUNT FUNDS

Defendants.

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Plaintiffs Gucci America, Inc. (“Gucci”) and Chloé SAS (“Chloé”) (collectively, “Plaintiffs”), and Defendants Laurette Company, Inc. and Jennifer Marie Mattchen a/k/a Jennifer Marie Kirk a/k/a Jennifer Besson, doing business as TheBagAddiction.com; and Patrick B. Kirk (collectively, “Defendants”), stipulate as follows:

1. Defendants, and any of them, may receive all funds, not to exceed \$50,000.00, in the form of a cashier’s check made payable to Davis & Leonard LLP from their merchant reserve account with Frontline Processing, close the account and deposit the funds in a trust account held by their counsel, Davis & Leonard LLP, to be held until final resolution of the above-captioned case.
2. The withdrawal and deposit of funds as provided in paragraph 1 shall not be treated as a violation of the Court’s stipulated injunction dated June 12, 2008.

3. Defendants and their counsel shall provide an accounting to Plaintiffs' counsel of the amount of funds transferred from the merchant reserve account with Frontline Processing and deposited into Davis & Leonard LLP's trust account.

GIBSON, DUNN & CRUTCHER LLP

Dated: August 11, 2008

By: Jennifer C. Halter
Robert L. Weigel
Jennifer C. Halter

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New York, New York 10166-0193
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*Attorneys for Plaintiff's – Gucci America, Inc. and
Chloé SAS*

Laurette Company, Inc.

Dated: August 13, 2008

By: J. Kirk
Jennifer Kirk, president Laurette Company, Inc.,
Defendant

Jennifer Marie Mattchen a/k/a Jennifer Marie Kirk
a/k/a Jennifer Besson, doing business as
TheBagAddiction.com

Dated: August 13, 2008

J. Kirk
Jennifer Kirk, Defendant

Patrick B. Kirk

Dated: August 13, 2008

P.B.K.
Patrick B. Kirk, Defendant

DAVIS & LEONARD LLP

Dated: August 13, 2008

By: Mark R. Leonard
Mark R. Leonard

Davis & Leonard LLP
8880 Cal Center Drive, Suite 180
Sacramento, California 95826
Telephone: (916) 362-9000
Facsimile: (916) 362-9066

Counsel for Defendants

SO ORDERED:

Paul A. Crotty
HONORABLE LEWIS A. KAPLAN
UNITED STATES DISTRICT JUDGE

Dated: August 19, 2008

Paul A. Crotty - Part I